

# EXHIBIT C

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14 Attorneys for DEFENDANTS CITY OF  
15 ANAHEIM, et al.

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

18 ANTONIO LOPEZ, individually;  
19 JOHANNA LOPEZ, individually;  
20 M.R., by and through his guardian ad  
21 litem, April Rodriguez, individually and  
22 as successor in interest to Brandon  
23 Lopez; B.L. and J.L., by and through  
24 their guardian ad litem Rachel Perez,  
25 individually and as successor in interest  
to Brandon Lopez; S.L., by and through  
his guardian ad litem, Rocio Flores,  
individually and as successor in interest  
to Brandon Lopez,

Plaintiffs,

vs.

CITY OF ANAHEIM; CITY OF  
SANTA ANA; DAVID VALENTIN;  
JORGE CISNEROS; PAUL  
DELGADO; BRETT HEITMAN;  
KENNETH WEBER; CAITLIN  
PANOV; DOES 1-10,

Defendants.

Case No. 8:22-cv-1351  
[Assigned for All Purposes to: Hon.  
James V. Selna ]

**DEFENDANT CITY OF  
ANAHEIM'S RESPONSES TO  
PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS,  
SET ONE**

Non-Expert DCO: 02/16/2024  
Trial Date: 05/14/2024

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PROPOUNDING PARTY: Plaintiff ANTONIO LOPEZ

2 | RESPONDING PARTY: Defendant CITY OF ANAHEIM

SET NO.: ONE

Defendant CITY OF ANAHEIM (“Defendant” or “Responding Party”) hereby provides its Responses to Plaintiff’s Requests for Production of Documents, Set One, pursuant to Rule 34 of the Federal *Rules of Civil Procedure*.

## **PRELIMINARY STATEMENT**

8        It should be noted that Responding Party has not fully completed its  
9 investigation of the facts relating to the case, has not fully completed discovery in  
10 this action, and has not completed preparation for trial. All of the responses  
11 contained herein are based only upon such information and documents which are  
12 presently available to and specifically known to Responding Party and disclose only  
13 those contentions which presently occur to Responding Party. It is anticipated that  
14 further discovery, independent investigation, legal research, and analysis will supply  
15 additional facts, add meaning to known facts, and establish entirely new factual  
16 conclusions and legal contentions, all of which may lead to substantial additions to,  
17 changes in, and variations from the contentions herein set forth. The following  
18 responses are given without prejudice to Responding Party's right to produce  
19 evidence of any subsequently discovered fact or facts which may later develop.

20 The responses contained herein are made in a good faith effort to supply as  
21 much factual information and as much specification of legal contention as is  
22 presently known, but should in no way be to the prejudice of Responding Party in  
23 relation to further discovery, research or analysis.

## GENERAL OBJECTIONS

25 The following responses are made solely for the purposes of this action. Each  
26 response is subject to any and all objections as to competence, relevance,  
27 materiality, propriety and admissibility, and any and all objections on grounds that  
28 would require the exclusion of any statement or material herein, if any question

1 were asked of, or any statement or material contained herein were made by, a  
2 witness present and testifying in court, all of which objections and grounds are  
3 reserved and may be interposed at the time of trial.

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1 **RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS**

2 **REQUEST NO. 1:**

3 Produce a complete copy of ALL police reports pertaining to the arrest and/or  
4 detention of PLAINTIFF Antonio Lopez during the INCIDENT.

5 **RESPONSE TO REQUEST NO. 1:**

6 OBJECTION: This request is compound as phrased. Additionally, this request  
7 calls for documents from multiple sources, some of which would not in the  
8 possession, custody, or control of the responding party. As such, this request seeks  
9 documents that are equally available to the propounding party as the responding  
10 party.

11 Further, as phrased, this request potentially calls for the production of  
12 documents or information that are privileged from disclosure under the federal law  
13 enforcement investigative privilege, the federal executive-deliberative process and  
14 official information privileges, the federal and California constitutional right to  
15 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
16 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
17 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
18 associated case law), and/or – in light of its broad phrasing so as to potentially include  
19 Defendants' *attorneys* – potentially including the attorney-client privilege (including  
20 but not limited to its investigative aspect) and/or the attorney work product protection.

21 Defendants incorporate by reference here each of the objections stated in the  
22 General Objections section, *supra*.

23 **REQUEST NO. 2:**

24 Produce a complete copy of ALL video footage, including but not limited to  
25 body worn camera footage, depicting the arrest and/or detention of PLAINTIFF  
26 Antonio Lopez during the INCIDENT.

27 **RESPONSE TO REQUEST NO. 2:**

28 OBJECTION: This request is compound as phrased. Additionally, this request

1 calls for documents from multiple sources, some of which would not in the  
2 possession, custody, or control of the responding party. As such, this request seeks  
3 documents that are equally available to the propounding party as the responding  
4 party.

5 Further, as phrased, this request potentially calls for the production of  
6 documents or information that are privileged from disclosure under the federal law  
7 enforcement investigative privilege, the federal executive-deliberative process and  
8 official information privileges, the federal and California constitutional right to  
9 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
10 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
11 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
12 associated case law), and/or – in light of its broad phrasing so as to potentially include  
13 Defendants' *attorneys* – potentially including the attorney-client privilege (including  
14 but not limited to its investigative aspect) and/or the attorney work product protection.

15 Defendants incorporate by reference here each of the objections stated in the  
16 General Objections section, *supra*.

17 **REQUEST NO. 3:**

18 Produce a complete copy of ALL photographs depicting the arrest and/or  
19 detention of PLAINTIFF Antonio Lopez during the INCIDENT.

20 **RESPONSE TO REQUEST NO. 3:**

21 **OBJECTION:** This request is compound as phrased. Additionally, this request  
22 calls for documents from multiple sources, some of which would not in the  
23 possession, custody, or control of the responding party. As such, this request seeks  
24 documents that are equally available to the propounding party as the responding  
25 party.

26 Further, as phrased, this request potentially calls for the production of  
27 documents or information that are privileged from disclosure under the federal law  
28 enforcement investigative privilege, the federal executive-deliberative process and

1 official information privileges, the federal and California constitutional right to  
2 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
3 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
4 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
5 associated case law), and/or – in light of its broad phrasing so as to potentially include  
6 Defendants’ *attorneys*— potentially including the attorney-client privilege (including  
7 but not limited to its investigative aspect) and/or the attorney work product protection.

8 Defendants incorporate by reference here each of the objections stated in the  
9 General Objections section, *supra*.

10 **REQUEST NO. 4:**

11 Produce a complete copy of ALL statements and/or interviews of civilian  
12 witnesses PERTAINING TO the arrest and/or detention of PLAINTIFF Antonio  
13 Lopez during the INCIDENT.

14 **RESPONSE TO REQUEST NO. 4:**

15 OBJECTION: This request is compound as phrased. Additionally, this request  
16 calls for documents from multiple sources, some of which would not in the  
17 possession, custody, or control of the responding party. As such, this request seeks  
18 documents that are equally available to the propounding party as the responding  
19 party.

20 Further, as phrased, this request potentially calls for the production of  
21 documents or information that are privileged from disclosure under the federal law  
22 enforcement investigative privilege, the federal executive-deliberative process and  
23 official information privileges, the federal and California constitutional right to  
24 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
25 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
26 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
27 associated case law), and/or – in light of its broad phrasing so as to potentially include  
28 Defendants’ *attorneys*— potentially including the attorney-client privilege (including

1 but not limited to its investigative aspect) and/or the attorney work product protection.

2 Defendants incorporate by reference here each of the objections stated in the  
3 General Objections section, *supra*.

4 **REQUEST NO. 5:**

5 Produce a complete copy of ALL statements and/or interviews of civilian  
6 witnesses PERTAINING TO the INCIDENT.

7 **RESPONSE TO REQUEST NO. 5:**

8 OBJECTION: This request is compound as phrased. Additionally, this request  
9 calls for documents from multiple sources, some of which would not in the  
10 possession, custody, or control of the responding party. As such, this request seeks  
11 documents that are equally available to the propounding party as the responding  
12 party.

13 Further, as phrased, this request potentially calls for the production of  
14 documents or information that are privileged from disclosure under the federal law  
15 enforcement investigative privilege, the federal executive-deliberative process and  
16 official information privileges, the federal and California constitutional right to  
17 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
18 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
19 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
20 associated case law), and/or – in light of its broad phrasing so as to potentially include  
21 Defendants' *attorneys* – potentially including the attorney-client privilege (including  
22 but not limited to its investigative aspect) and/or the attorney work product protection.

23 Defendants incorporate by reference here each of the objections stated in the  
24 General Objections section, *supra*.

25 **REQUEST NO. 6:**

26 Produce a complete copy of ALL statements and/or interviews of law  
27 enforcement personnel PERTAINING TO the arrest and/or detention of  
28 PLAINTIFF Antonio Lopez during the INCIDENT.

1 **RESPONSE TO REQUEST NO. 6:**

2       OBJECTION: This request is compound as phrased. Additionally, this request  
3 calls for documents from multiple sources, some of which would not in the  
4 possession, custody, or control of the responding party. As such, this request seeks  
5 documents that are equally available to the propounding party as the responding  
6 party.

7       Further, as phrased, this request potentially calls for the production of  
8 documents or information that are privileged from disclosure under the federal law  
9 enforcement investigative privilege, the federal executive-deliberative process and  
10 official information privileges, the federal and California constitutional right to  
11 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
12 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
13 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
14 associated case law), and/or – in light of its broad phrasing so as to potentially include  
15 Defendants' *attorneys*— potentially including the attorney-client privilege (including  
16 but not limited to its investigative aspect) and/or the attorney work product protection.

17       Defendants incorporate by reference here each of the objections stated in the  
18 General Objections section, *supra*.

19 **REQUEST NO. 7:**

20       Produce a complete copy of ALL statements and/or interviews of law  
21 enforcement personnel PERTAINING TO the INCIDENT.

22 **RESPONSE TO REQUEST NO. 7:**

23       OBJECTION: This request is compound as phrased. Additionally, this request  
24 calls for documents from multiple sources, some of which would not in the  
25 possession, custody, or control of the responding party. As such, this request seeks  
26 documents that are equally available to the propounding party as the responding  
27 party.

28       Further, as phrased, this request potentially calls for the production of

1 documents or information that are privileged from disclosure under the federal law  
2 enforcement investigative privilege, the federal executive-deliberative process and  
3 official information privileges, the federal and California constitutional right to  
4 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
5 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
6 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
7 associated case law), and/or – in light of its broad phrasing so as to potentially include  
8 Defendants' *attorneys* – potentially including the attorney-client privilege (including  
9 but not limited to its investigative aspect) and/or the attorney work product protection.

10 Defendants incorporate by reference here each of the objections stated in the  
11 General Objections section, *supra*.

12 **REQUEST NO. 8:**

13 Produce a complete copy of ALL statements and/or interviews by Defendants  
14 Paul Delgado, Brett Heitmann, Caitlin Panov, and Kenneth Weber PERTAINING  
15 TO the INCIDENT.

16 **RESPONSE TO REQUEST NO. 8:**

17 OBJECTION: This request is compound as phrased. Additionally, this request  
18 calls for documents from multiple sources, some of which would not in the  
19 possession, custody, or control of the responding party. As such, this request seeks  
20 documents that are equally available to the propounding party as the responding  
21 party.

22 Further, as phrased, this request potentially calls for the production of  
23 documents or information that are privileged from disclosure under the federal law  
24 enforcement investigative privilege, the federal executive-deliberative process and  
25 official information privileges, the federal and California constitutional right to  
26 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
27 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
28 832.8, as well as California Evidence Code sections 1040 through 1048, and the

1 associated case law), and/or – in light of its broad phrasing so as to potentially include  
2 Defendants' *attorneys* – potentially including the attorney-client privilege (including  
3 but not limited to its investigative aspect) and/or the attorney work product protection.

4 Defendants incorporate by reference here each of the objections stated in the  
5 General Objections section, *supra*.

6 **REQUEST NO. 9:**

7 Produce a complete copy of ALL video footage taken by journalists on scene  
8 during the INCIDENT.

9 **RESPONSE TO REQUEST NO. 9:**

10 OBJECTION: This request calls for documents from multiple sources, some  
11 of which would not in the possession, custody, or control of the responding party.  
12 As such, this request seeks documents that are equally available to the propounding  
13 party as the responding party.

14 Further, as phrased, this request potentially calls for the production of  
15 documents or information that are privileged from disclosure under the federal law  
16 enforcement investigative privilege, the federal executive-deliberative process and  
17 official information privileges, the federal and California constitutional right to  
18 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
19 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
20 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
21 associated case law), and/or – in light of its broad phrasing so as to potentially include  
22 Defendants' *attorneys* – potentially including the attorney-client privilege (including  
23 but not limited to its investigative aspect) and/or the attorney work product protection.

24 Defendants incorporate by reference here each of the objections stated in the  
25 General Objections section, *supra*.

26 **REQUEST NO. 10:**

27 Produce a complete copy of ALL documents pertaining to ALL extraction  
28 and/or analysis of DECEDENT's cellphone.

1 **RESPONSE TO REQUEST NO. 10:**

2       OBJECTION: This request is vague, ambiguous, and overbroad as phrased.  
3 Further, this request is compound as phrased. Additionally, this request calls for  
4 documents from multiple sources, some of which would not in the possession,  
5 custody, or control of the responding party. As such, this request seeks documents  
6 that are equally available to the propounding party as the responding party.

7       Further, as phrased, this request potentially calls for the production of  
8 documents or information that are privileged from disclosure under the federal law  
9 enforcement investigative privilege, the federal executive-deliberative process and  
10 official information privileges, the federal and California constitutional right to  
11 **privacy** (as underscored and/or augmented by the statutory peace officer personnel  
12 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
13 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
14 associated case law), and/or – in light of its broad phrasing so as to potentially include  
15 Defendants' *attorneys*— potentially including the attorney-client privilege (including  
16 but not limited to its investigative aspect) and/or the attorney work product protection.

17       Defendants incorporate by reference here each of the objections stated in the  
18 General Objections section, *supra*.

19 **REQUEST NO. 11:**

20       Produce a complete copy of the note addressed to DECEDENT's children  
21 found in the car DECEDENT was in during the INCIDENT.

22 **RESPONSE TO REQUEST NO. 11:**

23       OBJECTION: This request is vague, ambiguous, and overbroad as phrased. .

24       Further, as phrased, this request potentially calls for the production of  
25 documents or information that are privileged from disclosure under the federal law  
26 enforcement investigative privilege, the federal executive-deliberative process and  
27 official information privileges, the federal and California constitutional right to  
28 **privacy** (as underscored and/or augmented by the statutory peace officer personnel

1 records *Pitchess* privileges pursuant to California Penal Code sections 832.5 through  
2 832.8, as well as California Evidence Code sections 1040 through 1048, and the  
3 associated case law), and/or – in light of its broad phrasing so as to potentially include  
4 Defendants’ *attorneys* – potentially including the attorney-client privilege (including  
5 but not limited to its investigative aspect) and/or the attorney work product protection.

6 Defendants incorporate by reference here each of the objections stated in the  
7 General Objections section, *supra*.

8

9 DATED: December 11, 2023 LEWIS BRISBOIS BISGAARD & SMITH LLP

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12 By: / s / *Tori L. N. Bakken*

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TONY M. SAIN

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TORI L. N. BAKKEN

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Attorneys for DEFENDANTS CITY OF  
ANAHEIM, et al.

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**FEDERAL COURT PROOF OF SERVICE**  
LOPEZ, ANTONIO, et al. v. CITY OF ANAHEIM, et al.  
Case No. 8:22-cv-1351

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On December 11, 2023, I served the following document(s): **DEFENDANT CITY OF ANAHEIM'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Dale K. Galipo, Esq.  
Renee V. Masongsong, Esq.  
LAW OFFICES OF DALE K. GALIPO  
21800 Burbank Boulevard, Suite 310  
Woodland Hills, CA 91367  
Tel: (818) 347-3333  
Fax: (818) 347-4118  
[dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)  
[rvalentine@galipolaw.com](mailto:rvalentine@galipolaw.com)

**ATTORNEYS FOR PLAINTIFFS:**  
**B.L., J.L., and M.R.**

The documents were served by the following means:

- (BY U.S. MAIL) I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed above and I deposited the sealed envelope or package with the U.S. Postal Service, with the postage fully prepaid.
- (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on December 11, 2023, at Los Angeles, California.

/s/ *Curfew F. Wilson*

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Curfew F. Wilson